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Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

United States of America,

Plaintiff,

v.

**MELVIN D. BUNDY,
DAVID H. BUNDY,
JASON D. WOODS, and
JOSEPH D. O'SHAUGHNESSY,**

Defendants.

16-CR-0046-GMN-PAL

**MOTION TO CONTINUE MOTIONS,
DISCOVERY, AND TRIAL
DOCUMENTS DUE DATES**

CERTIFICATION: This motion is timely filed.

The United States, by and through Dayle Elieson, United States Attorney,
Steven W. Myhre, First Assistant United States Attorney, and Nadia Ahmed, and

1 Daniel R. Schiess, Assistant United States Attorneys, moves for an order continuing
2 until February 7, 2018, the due dates for the following matters:

- 3 • 1/26/18—Discovery for the trial of Melvin Bundy, David Bundy,
4 O'Shaughnessy, and Woods
- 5 • 1/29/18—Response to David Bundy's Motion to Disqualify the United
6 States Attorney's Office for the District of Nevada (ECF #3125)
- 7 • 1/29/18—Response to Woods's Motion to Compel Productions of
8 Outstanding Discovery, All Outstanding Brady Discovery & Wooten
9 Memo Related Communications & Discovery (ECF #3129)
- 10 • 1/31/18—Response to Woods' Motion for Application of Strictissimi
11 Juris Doctrine as Related to Freedom of Association & Co-Conspirator
12 Statements (ECF #3137)
- 13 • 2/1/18—Response to Mel Bundy's (Sealed) Motion to Dismiss Based on
14 Outrageous Government Conduct & Destruction of Evidence (ECF
15 #3138, redacted version ECF #3139)

16 On January 8, 2018, the Court ordered that the indictment against Cliven
17 Bundy, Ammon Bundy, Ryan Bundy, and Ryan Payne be dismissed with prejudice.
18 The Order identified principles of the law pertaining to self-defense and other
19 matters that will affect how the government proceeds with its responses to the
20 motions and its discovery obligations in connection to the pending trial. The
21 government needs until February 7, 2018, to complete its analysis and to
22 appropriately respond to and meet its obligations to the above-referenced items.

23 The government unsuccessfully consulted with counsel for Jason Woods in
an attempt to reach an agreement on the requested continuance. Due to its inability

1 to reach an agreement with Mr. Woods, the government has not consulted with the
2 remaining defendants, as a unified agreement would be needed in lieu of this
3 motion.

4 Wherefore, the government respectfully asks the Court to continue the due
5 dates on the above items to February 7, 2018.

6 **DATED** this 26th day of January, 2018.

7
8 Respectfully,

9 DAYLE ELIESON
United States Attorney

10 / s / *Daniel R. Schiess*

11 _____
STEVEN W. MYHRE
12 DANIEL R. SCHIESS
NADIA J. AHMED
13 Assistant United States Attorneys

14
15 **IT IS SO ORDERED.**

16 **DATED** this ³⁰ day of January, 2018.

17
18 
19 _____
Gloria M. Navarro, Chief Judge
United States District Court

CERTIFICATE OF SERVICE

I certify that I am an employee of the United States Attorney's Office. A copy of the foregoing **MOTION TO CONTINUE MOTIONS, DISCOVERY, AND TRIAL DOCUMENTS DUE DATES** was served upon counsel of record, via Electronic Case Filing (ECF).

DATED this 26th day of January, 2018.

/ s / Daniel R. Schiess

DANIEL R. SCHIESS
Assistant United States Attorney